

Sabinus A. Megwa (SBA #011266)
THE MEGWA LAW OFFICE
6811 South Central Avenue
Phoenix, Arizona 85042
Tel: (602) 243-6151
Email: megwalaw@qwestoffice.net
Attorney for Plaintiff Elvira Fernandez and the
Estate of Daniel Frank Rodriguez

Michael C. Manning (#016255)
Larry J. Wulkan (#021404)
STINSON MORRISON HECKER LLP
1850 North Central Avenue, Suite 2100
Phoenix, Arizona 85004-4584
Tel: (602) 279-1600
Fax: (602) 240-6925
Email: mmanning@stinson.com
Email: lwulkan@stinson.com
Attorneys for Plaintiff Frank Rodriguez and the
Estate of Daniel Frank Rodriguez

James J. Belanger (011393)
John C. Kelly (012770)
COPPERSMITH SCHERMER & BROCKELMAN PLC
2800 North Central Avenue, Suite 1200
Phoenix, Arizona 85004
Telephone: (602) 381-5485
jbelanger@csblaw.com
jkelly@csblaw.com
Attorneys for Defendant Richard A. Chrisman

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Elvira Fernandez, surviving mother of Daniel
Frank Rodriguez, individually and on behalf of
all statutory beneficiaries of Daniel Frank
Rodriguez, and as Co-Personal Representative
of the Estate of Daniel Frank Rodriguez; Frank
Rodriguez, as Co-Personal Representative of
the Estate of Daniel Frank Rodriguez

Plaintiffs,

v.

City of Phoenix, a public entity; Richard
Chrisman, individually and in his official
capacity as a City of Phoenix Police Officer,

Defendants.

NO. 2:11-CV-02001-FJM

**STIPULATION FOR ENTRY OF
JUDGMENT UNDER SEAL**

1 Plaintiffs Elvira Fernandez and Frank Rodriquez, individually and as Co-Personal
2 Representatives of the Estate of Daniel Frank Rodriguez, and Defendant Richard A. Chrisman,
3 hereby stipulate and agree:

4 1. That judgment be entered in Plaintiffs' favor and against Defendant in the
5 [proposed] form lodged herewith;

6 2. That the judgment be entered under seal, so as not to compromise Defendant's
7 right to a fair trial or Defendant's right to seat an impartial and unbiased jury in the criminal
8 proceedings currently pending against him in the Superior Court of the State of Arizona,
9 Maricopa County, *State v. Chrisman*, CR2010-153913-001; and

10 3. That all further proceedings and the trial in this matter may be vacated.

11 RESPECTFULLY SUBMITTED this 29th day of March, 2013.

12
13 **THE MEGWA LAW OFFICE**

14 By: s/ Sabinus A. Megwa, with Permission
15 Sabinus A. Megwa
16 6811 South Central Ave.
17 Phoenix, Arizona 85042
Attorney for Plaintiff Elvira Fernandez and
the Estate of Daniel Frank Rodriguez

18 **STINSON MORRISON HECKER LLP**

19 By: s/ Larry J. Wulkan
20 Michael C. Manning
21 Larry J. Wulkan
22 1850 North Central Avenue, Suite 2100
Phoenix, Arizona 85004-4584
Attorneys for Plaintiff Frank Rodriquez
and the Estate of Daniel Frank Rodriguez

23 **COPPERSMITH SCHERMER &**
24 **BROCKELMAN, PLC**

25 By: s/ James J. Belanger
26 James J. Belanger
27 John C. Kelly
28 1850 North Central Avenue, Suite 2100
Phoenix, Arizona 85004-4584
Attorneys for Defendant Richard A.
Chrisman

CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2013, I caused the foregoing document to be filed electronically with the Clerk of Court through ECF; and that ECF will send an e-notice of the electronic filing to:

Kathleen Wieneke
Christina Retts
STRUCK WIENEKE & LOVE, P.L.C.
3100 West Ray Road, Suite 300
Chandler, Arizona 85226
Attorneys for Defendant City of Phoenix
Attorneys for Defendants Sergio and Maria Virgillo

James J. Belanger
COPPERSMITH SCHERMER & BROCKELMAN PLC
2800 N. Central Avenue, Suite 1200
Phoenix, Arizona 85004
Attorney for Defendant Richard Chrisman

s/ Kathleen Kaupke